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Attorneys for Respondent  
PACESETTER BUSINESS PROPERTIES, INC.

UNITED STATES OF AMERICA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:

CERCLA SECTION 104(E) )  
INFORMATION REQUEST LETTER TO ) PACESETTER BUSINESS PROPERTIES,  
PACESETTER BUSINESS PROPERTIES, ) INC'S RESPONSE TO USEPA'S REQUEST  
INC. ) FOR INFORMATION AND PRODUCTION  
OF DOCUMENTS (Set 1)

RE: ORANGE COUNTY NORTH BASIN )  
STUDY AREA, ORANGE COUNTY, )  
CALIFORNIA )

PROPOUNDING PARTY: UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RESPONDING PARTY: PACESETTER BUSINESS PROPERTIES, INC

SET: ONE (1)

RESPONDENT, PACESETTER BUSINESS PROPERTIES, INC ("PBP, INC.") hereby  
responds to UNITED STATES ENVIRONMENTAL PROTECTION AGENCY'S ("EPA") Requests  
for Information and Document Production, Set No. 1 as follows:

**GENERAL OBJECTIONS**

1. These responses are made solely for the purpose of this proceeding. Each response is  
subject to all appropriate objections (including but not limited to, objections concerning competency,  
relevancy, materiality, propriety, and/or admissibility) which would require exclusion of any statement  
contained herein if the request were asked of, or any statement contained herein were made by, a  
witness present and testifying in court or an administrative proceeding. All such objections and  
grounds are reserved and may be interposed at all future times including at time of any hearings.

2. PBP, INC. has not yet completed its investigation of the facts relating to this proceeding. Therefore, the following responses are given without prejudice to the right to produce any subsequently discovered information and to amend these responses.

3. Although PBP, INC. will attempt to provide specific objections to each Request for Information/Production, PBP, INC.'s responses are given without waiving the right to object to each Request for Information/Production on the basis of relevancy, right of privacy, trade secret, joint defense privilege, attorney-client privilege, attorney work-product doctrine, or any other recognized evidentiary protections.

4. PBP, INC. objects that information and documents responsive to these Requests for Information/Production are in the possession and control of USEPA and/or is equally available to the USEPA from other publicly available documents and/or information.

5. Except for the explicit information and documents submitted herein, no admission of any nature whatsoever is implied or should be inferred from the responses below.

#### **OBJECTIONS TO DEFINITIONS**

PBP, INC. objects to the definition of "COMPANY" because it is compound, vague and ambiguous, overbroad, over inclusive, burdensome, harassing, and oppressive in that it mistakenly assumes and includes multiple corporate entities in the definition which are not and have not ever been related to each other and therefore is impermissibly and/or inappropriately misleading and confusing.

PBP, INC. objects to the definition of "DOCUMENTS" because it is compound, vague and ambiguous, overbroad, over inclusive, burdensome, harassing, confusing and oppressive in that it impermissibly and/or inappropriately calls for or references materials in the public domain.

PBP, INC. objects to the definition of "FACILITY" because it is compound, vague and ambiguous, overbroad, over inclusive, burdensome, harassing, and oppressive in that it mistakenly assumes and includes multiple physical addresses in the definition which are not and have not ever been related to each other and therefore is impermissibly and/or inappropriately misleading and

1 confusing.

2 PBP, INC. objects to the definition of "PERSON" because it is compound, vague and  
3 ambiguous, overbroad, over inclusive, burdensome, harassing, and oppressive in that it includes  
4 multiple entities and/or individuals in the definition not relevant to this litigation and therefore  
5 impermissibly and/or inappropriately calls for multiple responses.

6 PBP, INC. objects to the definition of "POLLUTANT OR CONTAMINANT" because it is  
7 compound, vague and ambiguous, overbroad, over inclusive, burdensome, harassing, confusing and  
8 oppressive in that it impermissibly and/or inappropriately calls for multiple responses.

9 PBP, INC. objects to the definition of "WASTE" and "WASTES" because it is compound,  
10 vague and ambiguous, overbroad, over inclusive, burdensome, harassing, confusing and oppressive in  
11 that it includes both hazardous and non-hazardous materials in the definition not relevant to this  
12 litigation and therefore impermissibly and/or inappropriately calls for multiple responses.

13 **PREAMBLE**

14 PBP, INC. has conducted an extensive review of all public records kept and maintained by the  
15 California Secretary of State's office for American Electric Motors, Inc. [C0199389] formed and  
16 incorporated in 1945 and which later changed its name to: American Electronics, Inc. (1954); and later  
17 to American Pacesetter, Inc. (1970); before its merger into Pacesetter Business Properties, Inc. This  
18 entity briefly owned the property located at 1600 East Valencia Drive, Fullerton, CA ("Property") as its  
19 principal place of business from 1964 to 1970.

20 Further, PBP, INC. has conducted an extensive review of all public records kept and  
21 maintained by the California Secretary of State's office for American Pacesetter, Inc. [C0582222]  
22 formed and incorporated in 1969 and which later changed its name to: American Electronics, Inc.  
23 (1970); before its merger as survivor with Micro-Check, Inc. (1984); its later merger as survivor with  
24 its corporate parent AEI Holdings, Inc. (1996). This entity occupied the property located at 1600 East  
25 Valencia Drive, Fullerton, CA ("Property") from 1970 to 2007 as an aerospace manufacturing facility.

1 This entity discovered and reported releases of the chlorinated solvents: Tetrachloroethylene (PCE),  
2 Trichloroethene (TCE), 1,1-dichloroethene (1,1-DCE), cis-1,2-dichloroethene (1,1-DCE), 1,2-  
3 dichloroethane (1,2-DCA) and Toluene in 1987; and, entered into a \$400,000 Responsible Party  
4 settlement with the Orange County Water District for regional water pollution in 2007. Based upon  
5 research of publicly available data PBP, INC. is informed and believes Ducommun Inc., acquired  
6 American Electronics Inc. of Fullerton, California on or about June 18, 1998. PBP, INC. is informed  
7 and believes American Electronics Inc. was thereafter integrated with Ducommun's Jay-El Products  
8 subsidiary and relocated to Jay-El Products' Carson, California facility. PBP, INC. is informed and  
9 believes in 1997 American Electronics Inc. reported 1997 sales of \$7.1 million. At the time American  
10 Electronics Inc. manufactured actuators, stepper motors, fractional horsepower motors and resolvers  
11 for commercial and military space applications. PBP, INC. is informed and believes at the time  
12 William Holland was president of American Electronics Inc. and thereafter remained with the  
13 company. PBP, INC. is informed and believes American Electronics Inc. was suspended by the  
14 California Franchise Tax Board in 2007.

15 Finally, PBP, INC. has conducted an extensive review of all public records kept and maintained  
16 by the California Secretary of State's office for AEI Development, Inc. [C0593067] formed and  
17 incorporated in 1970 and which later that year merged in Pacesetter Homes, Inc. (merged corporation),  
18 followed by its 1972 merger with J. W. Klug Development Co., Inc. (merged corporation), and its  
19 1988 name change to Pacesetter Business Properties, Inc. This entity has no record of ever owning or  
20 occupying the property located at 1600 East Valencia Drive, Fullerton, CA ("Property").

21 A full and complete Chronology of Pacesetter Business Properties is attached hereto and  
22 incorporated by reference as **EXHIBIT 1**.

### 23 **RESPONSES TO REQUESTS FOR PRODUCTION**

#### 24 **REQUEST FOR INFORMATION/PRODUCTION NO. 1:**

25 State the full legal name, address, telephone number, email address, and position(s) held by

any individual answering any of these questions on behalf of Pacesetter Business Properties and its predecessor American Pacesetter (f/k/a, American Electronics, Inc.) (together, the Company).

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 1.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of its records, PBP, INC. responds as follows:

These Responses were prepared by Thomas J. Bois, Bois & Macdonald, 2030 Main Street, Suite 660, Irvine, California, Tel. (949) 660-0011 x20, [tbois@boismac.com](mailto:tbois@boismac.com) in his capacity as outside corporate counsel for Pacesetter Business Properties, Inc. Mr. Bois has had no past or current relationship with American Electronics, Inc. Mr. Bois was assisted by PNB, INC.'s Chief Executive Officer Eric Strauss, and its Chief Financial Officer Kurt Klug.

**REQUEST FOR INFORMATION/PRODUCTION NO. 2:**

Identify the dates the Company, under any of its current or former business structures, owned and/or operated the facility located at 1600 East Valencia Drive/501 S. Acacia Avenue, Fullerton, California (the "Facility").

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 2.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of it records, PBP, INC. responds as follows:

PBP, INC. has conducted a diligent and thorough investigation of it records also conducted a search of the LexisNexis public records database for the property located at 1600 East Valencia Drive, Fullerton, California ("Property"). Public title records reflect the improvements at 1600 East Valencia Drive, Fullerton Site were initially constructed in 1961..Public title and leasehold records reference none of the following entities have ever held title to, or occupied, the Property: AEI Development, Inc. [C0593067]; Pacesetter Homes, Inc. (merged corporation); J. W. Klug Development Co., Inc. (merged corporation); and/or Pacesetter Business Properties, Inc.

In addition, PBP, INC. has conducted a search of the LexisNexis public records database for the property located at 501 S. Acacia Avenue, Fullerton, California. Public title and leasehold records reference none of the following entities have ever held title to, or occupied, 501 S. Acacia Avenue, Fullerton, California: AEI Development, Inc. [C0593067]; Pacesetter Homes, Inc. (merged corporation); J. W. Klug Development Co., Inc. (merged corporation); and/or Pacesetter Business Properties, Inc.

American Electric Motors, Inc. [C0199389] was formed and incorporated in 1945 and later changed its name to American Electronics, Inc. (1954); and later changed its name to American Pacesetter, Inc. (1970); and, later merged into Pacesetter Business Properties, Inc. This entity briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any chemical usage, and no known or suspected chemical releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970.

**REQUEST FOR INFORMATION/PRODUCTION NO. 3:**

Identify the individuals who are or were responsible for environmental matters at the Facility during its operation at this address. For each individual responsible for environmental

1 matters, provide his/her full name, current or last known address, current or last known telephone  
2 number, position titles, and the dates the individual held such positions.

3 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 3.**

4 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
5 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the  
6 grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure  
7 of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for  
8 compound responses and/or a compilation.

9 Without waiving these objections, and after conducting a diligent and thorough investigation of  
10 it records, PBP, INC. responds as follows:

11 PBP, INC. objects to this Request on the grounds it calls for attorney-client privileged information,  
12 expert witness testimony, and potential disclosure of protected attorney work product. The Request is also  
13 vague, ambiguous and overbroad as it calls for compound responses and/or a compilation; and, it calls for  
14 speculation.

15 Without waiving these objections, and after conducting a diligent and thorough investigation of  
16 it records, PBP, INC. responds as follows:

17 Based on public records from the California Secretary of State, the Lexis/Nexis database  
18 and the Google Search Engine it appears American Pacesetter, Inc. [C0582222] thereafter renamed  
19 American Electronics, Inc. in 1970 owned and operated an aerospace manufacturing facility at 1600  
20 East Valencia Drive, Fullerton, CA from 1970 until approximately 2007 (37 years). The individuals  
21 knowledgeable of operations related to use of PCE, TCE, 1,1,1-TC, 1,1-DCE, 1,4-dioxane and/or  
22 perchlorate appear to be:

23 (i) Incorporators: David H. Vena; Bruce H. Lederman and Thomas Dobson [addresses  
24 unknown];

25 (ii) Richard F. Holland, President [address unknown];

1 (iii) Jean M. Rhodes, Secretary [address unknown];

2 (iv) Officers: Joseph C. Berenato, CEO; Samuel D. Williams, CFO [addresses unknown];

3 and,

4 (v) Directors: Joseph C. Berenato; James S. Heiser, Michael W. Williams [addresses  
5 unknown].

6 During the brief period between 1964 to 1970 that American Electric Motors, Inc. [C0199389] (thereafter  
7 renamed American Pacesetter, Inc.) occupied the 1600 East Valencia Drive, Fullerton, California property  
8 the only persons with knowledge of site usage were: Robert C. Loomis, President (1964-1966) and Robert  
9 B. Phinzy (1966-1970). Their addresses are unknown and they are believed to be deceased.

10 **REQUEST FOR INFORMATION/PRODUCTION NO. 4:**

11 Identify all current and former employees who have knowledge of the Company's operations  
12 at the Facility that relate to the creation, use, storage, or disposal of PCB, TCE, 1,1,1-TCA, 1,1-  
13 DCE, 1,4-dioxane, or perchlorate. This includes individuals whose job functions included  
14 operations that utilized or generated these hazardous substances, or who were responsible for  
15 storing/ filling/disposing of hazardous substances and/or wastes containing the above-identified  
16 chemicals. For each individual, provide his/her full name, current or last known address, current or  
17 last known telephone number, position title, and the dates the individual held such position.

18 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 4.**

19 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
20 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the  
21 grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure  
22 of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for  
23 compound responses and/or a compilation.

24 Without waiving these objections, and after conducting a diligent and thorough investigation of  
25 it records, PBP, INC. responds as follows:

Based on public records from the California Secretary of State, the Lexis/Nexis database and the Google Search Engine it appears American Pacesetter, Inc. [C0582222] thereafter renamed American Electronics, Inc. in 1970 owned and operated an aerospace manufacturing facility at 1600 East Valencia Drive, Fullerton, CA from 1970 until approximately 2007 (37 years). The individuals knowledgeable of operations related to use of PCE, TCE, 1,1,1-TC, 1,1-DCE, 1,4-dioxane and/or perchlorate appear to be:

(i) Incorporators: David H. Vena; Bruce H. Lederman and Thomas Dobson [addresses unknown];

(ii) Richard F. Holland, President [address unknown];

(iii) Jean M. Rhodes, Secretary [address unknown];

(iv) Officers: Joseph C. Berenato, CEO; Samuel D. Williams, CFO [addresses unknown];

and,

(v) Directors: Joseph C. Berenato; James S. Heiser, Michael W. Williams [addresses unknown].

During the brief period between 1964 to 1970 that American Electric Motors, Inc. [C0199389] (thereafter renamed American Pacesetter, Inc.) briefly owned and occupied the 1600 East Valencia Drive, Fullerton, California property the only persons with knowledge of site usage were: Robert C. Loomis, President (1964-1966) and Robert B. Phinizy (1966-1970). Their addresses are unknown and they are believed to be deceased.

**REQUEST FOR INFORMATION/PRODUCTION NO. 5:**

Identify all current and former employees who have knowledge of the Company's operations at the Facility that relate to the physical layout of each operational area of the Facility, who could explain the day-to-day flow of the operations, or who know [sic] the location of physical features such as clarifiers, degreasers, and above- and below- ground storage tanks. For each individual, provide his/her full name, current or last known address, current or last known

1 telephone number, position, title, and the dates the individual held such position.

2 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 5.**

3 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
4 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the  
5 grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure  
6 of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for  
7 compound responses and/or a compilation.

8 Without waiving these objections, and after conducting a diligent and thorough investigation of  
9 it records, PBP, INC. responds as follows:

10 Based on public records from the California Secretary of State, the Lexis/Nexis database  
11 and the Google Search Engine it appears American Pacesetter, Inc. [C0582222] thereafter renamed  
12 American Electronics, Inc. in 1970 owned and operated an aerospace manufacturing facility at 1600  
13 East Valencia Drive, Fullerton, CA from 1970 until approximately 2007 (37 years). The individuals  
14 knowledgeable of operations related to use of PCE, TCE, 1,1,1-TC, 1,1-DCE, 1,4-dioxane and/or  
15 perchlorate appear to be:

16 (i) Incorporators: David H. Vena; Bruce H. Lederman and Thomas Dobson [addresses  
17 unknown];

18 (ii) Richard F. Holland, President [address unknown];

19 (iii) Jean M. Rhodes, Secretary [address unknown];

20 (iv) Officers: Joseph C. Berenato, CEO; Samuel D. Williams, CFO [addresses unknown];

21 and,

22 (v) Directors: Joseph C. Berenato; James S. Heiser, Michael W. Williams [addresses  
23 unknown].

24 During the brief period between 1964-1970 that American Electric Motors, Inc. [C0199389] (thereafter  
25 renamed American Pacesetter, Inc.) briefly owned and occupied the 1600 East Valencia Drive, Fullerton,

1 California property the only persons with knowledge of site usage were: Robert C. Loomis, President  
2 (1964-1966) and Robert B. Phinizy (1966-1970). Their addresses are unknown and they are believed to be  
3 deceased.

4 **REQUEST FOR INFORMATION/PRODUCTION NO. 6:**

5 Explain the Company's present corporate status (e.g. active, suspended, defunct, merged,  
6 dissolved) as well as its operational status (e.g. whether and where business operations are currently  
7 occurring).

8 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 6.**

9 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
10 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the  
11 grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure  
12 of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for  
13 compound responses and/or a compilation.

14 Without waiving these objections, and after conducting a diligent and thorough investigation of  
15 it records, PBP, INC. responds as follows:

16 (i) Pacesetter Business Properties, Inc. [C0593067] was formed in 1970 as a California  
17 domestic stock corporation. It is an active corporation in good standing and is  
18 conducting business at the current time.

19 (ii) American Electric Motors, Inc. [C0199389] was formed in 1945 as a California  
20 domestic stock corporation, it later changed its name to American Electronics, Inc. in  
21 1954; and later changed its name to American Pacesetter, Inc. (1970); before its merger  
22 into Pacesetter Business Properties, Inc. As such, American Pacesetter, Inc. is no longer  
23 an active or existing business entity.

24 ( Without waiving these objections, and after conducting a diligent and thorough investigation of  
25 California Secretary of State's records and utilizing the Google Search Engine, PBP, INC. responds as

1 follows regarding American Electronics, Inc.: American Pacesetter, Inc. [C0582222] was renamed  
2 American Electronics, Inc. in 1970 owned and operated an aerospace manufacturing facility at 1600  
3 East Valencia Drive, Fullerton, CA from 1970 until approximately 2007 (37 years) at which time it was  
4 suspended by the California Franchise Tax Board. It is presumed to still be an inactive suspended business  
5 entity.

6 **REQUEST FOR INFORMATION/PRODUCTION NO.7:**

7 Provide the date and in which State the Company was incorporated, formed, or  
8 organized.

9 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 7.**

10 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
11 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the  
12 grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure  
13 of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for  
14 compound responses and/or a compilation.

15 Without waiving these objections, and after conducting a diligent and thorough investigation of  
16 it records, PBP, INC. responds as follows:

- 17 (i) Pacesetter Business Properties, Inc. [C0593067] was formed and incorporated in 1970  
18 as a California domestic stock corporation.
- 19 (ii) American Electric Motors, Inc. [C0199389] was formed and incorporated in 1945, later  
20 changed its name to American Electronics, Inc. in 1954; and later changed its name to  
21 American Pacesetter, Inc. (1970) before its merger into Pacesetter Business Properties,  
22 Inc.

23 Without waiving these objections, and after conducting a diligent and thorough investigation of  
24 California Secretary of State's records and utilizing the Google Search Engine, PBP, INC. responds as  
25 follows regarding American Electronics, Inc.: American Pacesetter, Inc. nka American Electronics,

1 Inc. [C0582222] is believed to have been formed and incorporated on October 7, 1969 as a California  
2 domestic stock corporation.

3 **REQUEST FOR INFORMATION/PRODUCTION NO. 8:**

4 EPA has identified two companies that operated under the name of American Electronics,  
5 Inc. at the Facility: 1) American Pacesetter (f/k/a, American Electronics, Inc.), a company  
6 incorporated in California in 1945 (AEI #1) and predecessor to Pacesetter Business Properties;  
7 and 2) American Electronics, Inc. (f/k/a American Pacesetter, Inc.) a company  
8 incorporated in California in 1969 ("AEI #2"). Describe the corporate relationship or other  
9 affiliation between AEI #1 and AEI #2, and identify the time period(s) during which the  
10 relationship or affiliation existed.

11 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 8.**

12 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
13 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the  
14 grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure  
15 of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for  
16 compound responses and/or a compilation.

17 Without waiving these objections, and after conducting a diligent and thorough investigation of  
18 it records, PBP, INC. responds as follows:

- 19 (i) Pacesetter Business Properties, Inc. [C0593067] was formed in 1970 as a California  
20 domestic stock corporation doing business under its originally incorporated name AEI  
21 Development, Inc. In 1970 Pacesetter Homes, Inc. was merged into AEI Development,  
22 Inc. (successor) and the entity changed its name to Pacesetter Homes, Inc. In 1972 J.W.  
23 Klug Development Co., Inc. was merged into Pacesetter Homes, Inc. (successor). In  
24 1988 Pacesetter Homes, Inc. changed its name to Pacesetter Business Properties, Inc.  
25 and has since continuously operated under that name.

1 (ii) American Electric Motors, Inc. a/k/a "AEI #1" [C0199389] was formed in 1945 as a  
2 California domestic stock corporation, it later changed its name to American  
3 Electronics, Inc. in 1954. In 1959 Cal-Air Engineering, Inc. merged into American  
4 Electronics, Inc. (successor). On June 11, 1970 American Electronics, Inc. amended its  
5 Articles of Incorporation changing its name to American Pacesetter, Inc. That same  
6 day, American Pacesetter, Inc. amended its Articles of Incorporation changing its name  
7 to American Electronics, Inc. Thereafter, on December 26, 2002 American Pacesetter,  
8 Inc. merged into Pacesetter Business Properties, Inc. Other than the June 11, 1970  
9 concurrent name changes (i.e. name swap) between American Electronics, Inc. and  
10 American Pacesetter, Inc. there is no other known subsequent relationship or affiliation  
11 between the two entities.

12 (iii) American Pacesetter, Inc. a/k/a "AEI #2" [C0582222] was formed in 1969 as a  
13 California domestic stock corporation. On June 11, 1970 American Pacesetter, Inc.  
14 amended its Articles of Incorporation changing its name to American Electronics, Inc.  
15 That same day, American Electronics, Inc. amended its Articles of Incorporation  
16 changing its name to American Pacesetter, Inc. Other than the June 11, 1970 concurrent  
17 name changes (i.e. name swap) between American Electronics, Inc. and American  
18 Pacesetter, Inc. there is no other known subsequent relationship or affiliation between  
19 the two entities. Following the name swap American Electronics, Inc. merged as  
20 survivor with Micro-Check, Inc. (1984); it later merged as survivor with its corporate  
21 parent AEI Holdings, Inc. (1996). This entity occupied the property located at 1600  
22 East Valencia Drive, Fullerton, CA ("Property") from 1970 to 2007 as an aerospace  
23 manufacturing facility. This entity discovered and reported releases of the chlorinated  
24 solvents: Tetrachloroethylene (PCE), Trichloroethene (TCE), 1,1-dichloroethene (1,1-  
25 DCE), cis-1,2-dichloroethene (1,1-DCE), 1,2-dichloroethane (1,2-DCA) and Toluene

1 in 1987; and, entered into a \$400,000 Responsible Party settlement with the Orange  
2 County Water District for regional water pollution in 2007. Based upon research of  
3 publicly available data PBP, INC. is informed and believes Ducommun Inc., acquired  
4 American Electronics Inc. of Fullerton, California on or about June 18, 1998. PBP,  
5 INC. is informed and believes American Electronics Inc. was thereafter integrated with  
6 Ducommun's Jay-El Products subsidiary and relocated to Jay-El Products' Carson,  
7 California facility. PBP, INC. is informed and believes in 1997 American Electronics  
8 Inc. reported 1997 sales of \$7.1 million. At the time American Electronics Inc.  
9 manufactured actuators, stepper motors, fractional horsepower motors and resolvers for  
10 commercial and military space applications. PBP, INC. is informed and believes at the  
11 time William Holland was president of American Electronics Inc. and thereafter  
12 remained with the company. PBP, INC. is informed and believes American Electronics  
13 Inc. was suspended by the California Franchise Tax Board in 2007.

14 **REQUEST FOR INFORMATION/PRODUCTION NO. 9:**

15 Identify the business structure (e.g., sole proprietorship, general partnership, limited  
16 partnership, joint venture, or corporation) under which the Company currently exists or operates,  
17 and identify each business structure under which it existed or operated while at the Facility  
18 location. For each business structure and name under which the Company has existed or operated  
19 at the Facility, provide the corresponding dates that it existed or operated under that business  
20 structure and name.

21 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 9.**

22 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
23 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on  
24 the grounds it calls for attorney-client privileged information, expert witness testimony, and potential  
25 disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad

1 as it calls for compound responses and/or a compilation.

2 Without waiving these objections, and after conducting a diligent and thorough investigation  
3 of it records, PBP, INC. responds as follows:

4 (i) Pacesetter Business Properties, Inc. [C0593067] was formed and incorporated in 1970  
5 as a California domestic stock corporation. PBP, INC. has conducted a search of the  
6 LexisNexis public records database for the property located at 1600 E. Valencia  
7 Avenue, Fullerton, California. Public title and leasehold records reference none of the  
8 following entities have ever held title to, or occupied, 1600 E. Valencia Avenue,  
9 Fullerton, California: AEI Development, Inc. [C0593067]; Pacesetter Homes, Inc.  
10 (merged corporation); J. W. Klug Development Co., Inc. (merged corporation); and/or  
11 Pacesetter Business Properties, Inc.

12 (ii) American Electric Motors, Inc. [C0199389] was formed and incorporated in 1945 as a  
13 California domestic stock corporation. PBP, INC. has conducted a search of the  
14 California Secretary of State records database which indicates during the brief period  
15 between 1964-1970 American Electric Motors, Inc. (then known as American  
16 Electronics, Inc.) occupied the 1600 East Valencia Drive, Fullerton, California  
17 property. There are no known or suspected records of any chemical usage, and no  
18 known or suspected chemical releases of any kind, at the 1600 East Valencia Drive,  
19 Fullerton, California site during the period 1964-1970.

20 (iii) American Pacesetter, Inc. a/k/a "AEI #2" [C0582222] was formed in 1969 as a  
21 California domestic stock corporation. This entity, which on June 11, 1970 amended  
22 its Articles of Incorporation changing its name to American Electronics, Inc., occupied  
23 the property located at 1600 East Valencia Drive, Fullerton, CA ("Property") from  
24 1970 to 2007 as an aerospace manufacturing facility. This entity discovered and  
25 reported releases of the chlorinated solvents: Tetrachloroethylene (PCE),

Trichloroethene (TCE), 1,1-dichloroethene (1,1-DCE), cis-1,2-dichloroethene (1,1-DCE), 1,2-dichloroethane (1,2-DCA) and Toluene in 1987; and, entered into a \$400,000 Responsible Party settlement with the Orange County Water District for regional water pollution in 2007. Based upon research of publicly available data PBP, INC. is informed and believes Ducommun Inc., acquired American Electronics Inc. of Fullerton, California on or about June 18, 1998. PBP, INC. is informed and believes American Electronics Inc. was thereafter integrated with Ducommun's Jay-El Products subsidiary and relocated to Jay-El Products' Carson, California facility. PBP, INC. is informed and believes in 1997 American Electronics Inc. reported 1997 sales of \$7.1 million. At the time American Electronics Inc. manufactured actuators, stepper motors, fractional horsepower motors and resolvers for commercial and military space applications. PBP, INC. is informed and believes at the time William Holland was president of American Electronics Inc. and thereafter remained with the company. PBP, INC. is informed and believes American Electronics Inc. was suspended by the California Franchise Tax Board in 2007.

**REQUEST FOR INFORMATION/PRODUCTION NO. 10:**

If the Company operated at the Facility as a subsidiary, division, or other business unit, provide this information and identify where it fits into the larger company's structural organization.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 10.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation

of it records, PBP, INC. responds as follows:

(i) Pacesetter Business Properties, Inc. [C0593067] was formed in 1970 as a California domestic stock corporation doing business under its originally incorporated name AEI Development, Inc. In 1970 Pacesetter Homes, Inc. was merged into AEI Development, Inc. (successor) and the entity changed its name to Pacesetter Homes, Inc. In 1972 J.W. Klug Development Co., Inc. was merged into Pacesetter Homes, Inc. (successor). In 1988 Pacesetter Homes, Inc. changed its name to Pacesetter Business Properties, Inc. and has since continuously operated under that name. This entity never owned or operated at either 1600 East Valencia Drive, Fullerton, CA or 501 S. Acacia Avenue, Fullerton, CA.

(ii) American Electric Motors, Inc. a/k/a "AEI #1" [C0199389] was formed in 1945 as a California domestic stock corporation, it later changed its name to American Electronics, Inc. in 1954. In 1959 Cal-Air Engineering, Inc. merged into American Electronics, Inc. (successor). On June 11, 1970 American Electronics, Inc. amended its Articles of Incorporation changing its name to American Pacesetter, Inc. That same day, American Pacesetter, Inc. amended its Articles of Incorporation changing its name to American Electronics, Inc. Thereafter, on December 26, 2002 American Pacesetter, Inc. merged into Pacesetter Business Properties, Inc. This entity briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any chemical usage, and no known or suspected chemical releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970.

**REQUEST FOR INFORMATION/PRODUCTION NO. 11:**

If the Company is now using or has ever used a fictitious business name while operating at the Facility, identify the fictitious names and the owners of each fictitious name.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 11.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of its records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have used a fictitious business name and never owned the Property or operated the Facility.
- (ii) American Electric Motors, Inc. a/k/a "AEI #1" [C0199389] is not known or believed to have used a fictitious business name. This entity briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any chemical usage, and no known or suspected chemical releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970.

**REQUEST FOR INFORMATION/PRODUCTION NO. 12:**

If the Company sold the Facility property, provide the date on which the Facility property was sold and the person or entity to whom it was sold. To the extent known, indicate whether you understand whether the buyer planned to continue the same or similar business operations at the Facility as that conducted by the Company. To the extent you are aware, include any information regarding changes planned by the buyer regarding operations that involve the use, storage, or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate (e.g., plans to add or dismantle clarifiers, change the types of solvents being used).

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 12.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of its records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility and was not engaged in any property sale.
- (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any chemical usage, and no known or suspected chemical releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the Property became an asset of American Pacesetter, Inc. This entity was not engaged in any property sale.
- (iii) American Pacesetter, Inc. a/k/a "AEI #2" [C0582222] was formed in 1969 as a California domestic stock corporation. This entity occupied the property located at 1600 East Valencia Drive, Fullerton, CA from 1970 to 2007 as an aerospace manufacturing facility. City of Fullerton, CA Fire Department records reference the extensive use of Tetrachloroethylene (PCE) and Trichloroethene during this era. This entity discovered and reported releases of the chlorinated solvents: PCE, TCE, 1,1-DCE, 1,1-DCE, 1,2-DCA and Toluene in 1987; and, entered into a \$400,000 Responsible Party settlement with the Orange County Water District for regional water pollution in 2007. Based upon research of publicly available data PBP, INC. is

1 informed and believes Ducommun Inc., acquired American Electronics Inc. of  
2 Fullerton, California on or about June 18, 1998. PBP, INC. is informed and believes  
3 American Electronics Inc. was thereafter integrated with Ducommun's Jay-El Products  
4 subsidiary and relocated to Jay-El Products' Carson, California facility. PBP, INC. is  
5 informed and believes in 1997 American Electronics Inc. reported 1997 sales of \$7.1  
6 million. At the time American Electronics Inc. manufactured actuators, stepper  
7 motors, fractional horsepower motors and resolvers for commercial and military space  
8 applications. PBP, INC. is informed and believes at the time William Holland was  
9 president of American Electronics Inc. and thereafter remained with the company.  
10 PBP, INC. is informed and believes American Electronics Inc. was suspended by the  
11 California Franchise Tax Board in 2007. The Lexis Nexis database references  
12 American Electronics Inc. ("AEI #2") sold the Property to Wohl of Cypress, LLC on  
13 November 26, 2003.

14 **REQUEST FOR INFORMATION/PRODUCTION NO. 13:**

15 If the Facility was operated by other parties prior to the Company's operations, identify the prior  
16 operators and describe those previous operations to the extent known. Describe any changes made to  
17 operations by the Company after it began operating at the Facility that changed (either increases or  
18 decreases) the use or disposal of PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

19 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 13.**

20 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
21 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on  
22 the grounds it calls for attorney-client privileged information, expert witness testimony, and potential  
23 disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad  
24 as it calls for compound responses and/or a compilation.

25 Without waiving these objections, and after conducting a diligent and thorough investigation

of it records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility.
- (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. PNB, INC. is informed and believes the Property was agricultural land during the 1947-1961 era. PNB, INC. is informed and believes the Property was initially improved during the 1961-1963 era. There are no other reported or suspected operations of any kind, at the 1600 East Valencia Drive, Fullerton, California site prior to the 1947 era.

**REQUEST FOR INFORMATION/PRODUCTION NO. 14:**

For any period of time in which the Company owned the Facility under any of its current or former business structures and leased the Facility, provide the name, address, and phone number of any tenants and/or lessees.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 14.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of it records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility or engaged in any lease transactions.
- (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no

known or suspected leasehold transactions of any kind, at the 1600 East Valencia Drive, Fullerton, California site from 1964 to 1970.

**REQUEST FOR INFORMATION/PRODUCTION NO. 15:**

For any period of time in which the Company under any of its current or former business structures operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner and/or lessor.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 15.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of it records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility or engaged in any lease transactions.
- (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected leasehold transactions of any kind, at the 1600 East Valencia Drive, Fullerton, California site from 1964 to 1970.

**REQUEST FOR INFORMATION/PRODUCTION NO. 16:**

Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and any products manufactured or services performed at the Facility. Describe any significant change in Facility size, the Company's number of employees, and the products manufactured or services performed over time.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 16.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of its records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility and was not engaged in any property sale. PNB, INC. has no information or knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced.
- (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any chemical usage, and no known or suspected chemical releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC. has no information or knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced.
- (iii) American Pacesetter, Inc. a/k/a "AEI #2" [C0582222] was formed in 1969 as a California domestic stock corporation. This entity occupied the property located at 1600 East Valencia Drive, Fullerton, CA ("Property") from 1970 to 2007 (37 years) as

1 an aerospace manufacturing facility. City of Fullerton, CA Fire Department records  
2 reference the extensive use of Tetrachloroethylene (PCE) and Trichloroethene (TCE)  
3 during this era. City of Fullerton, CA Fire Department records reference the extensive  
4 expansion of operations during this era which included installation of an underground  
5 storage tank as well as the storage and usage of large volumes of PCE, TCE and other  
6 manufacturing chemicals. This entity discovered and reported releases of the  
7 chlorinated solvents: PCE, TCE, 1,1-DCE, 1,1-DCE, 1,2-DCA and Toluene in 1987;  
8 and, entered into a \$400,000 Responsible Party settlement with the Orange County  
9 Water District for regional water pollution in 2007. Based upon research of publicly  
10 available data PBP, INC. is informed and believes Ducommun Inc., acquired  
11 American Electronics Inc. of Fullerton, California on or about June 18, 1998. PBP,  
12 INC. is informed and believes American Electronics Inc. was thereafter integrated  
13 with Ducommun's Jay-El Products subsidiary and relocated to Jay-El Products'  
14 Carson, California facility. PBP, INC. is informed and believes in 1997 American  
15 Electronics Inc. reported 1997 sales of \$7.1 million. At the time American Electronics  
16 Inc. manufactured actuators, stepper motors, fractional horsepower motors and  
17 resolvers for commercial and military space applications. PBP, INC. is informed and  
18 believes at the time William Holland was president of American Electronics Inc. and  
19 thereafter remained with the company. PBP, INC. is informed and believes American  
20 Electronics Inc. was suspended by the California Franchise Tax Board in 2007. The  
21 Lexis Nexis database references American Electronics Inc. sold the Property to Wohl  
22 of Cypress, LLC on November 26, 2003.

23 **REQUEST FOR INFORMATION/PRODUCTION NO. 17:**

24 Provide a map of the Facility showing the locations of buildings and significant features on the  
25 property at the time that the Company operated at the Facility. Indicate the locations of any

1 maintenance shops, machine shops, degreasers, clarifiers, plating areas, painting areas, cooling  
2 towers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of  
3 the Facility and identify the following:

- 4 a. Surface structures (e.g., buildings, tanks, containment areas, storage areas);
- 5 b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers);
- 6 c. Stormwater drainage system and sanitary sewer system, including septic tanks and  
7 subsurface disposal fields;
- 8 d. Any and all additions, demolitions, or changes of any kind to physical structures on, under,  
9 or about the Facility or to the property itself (e.g., excavation work) and the dates on which  
10 such changes occurred; and
- 11 e. The location of all waste storage or waste accumulation areas as well as waste disposal  
12 areas (e.g., dumps, leach fields, burn pits).

13 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 17.**

14 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
15 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on  
16 the grounds it calls for attorney-client privileged information, expert witness testimony, and potential  
17 disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad  
18 as it calls for compound responses and/or a compilation.

19 Without waiving these objections, and after conducting a diligent and thorough investigation  
20 of it records, PBP, INC. responds as follows:

- 21 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever  
22 owned the Property or operated the Facility and was not engaged in any property sale.  
23 PNB, INC. has no information or knowledge of the operations conducted at 1600 East  
24 Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the  
25 City of Fullerton and is producing a complete copy of all records produced which

include several maps.

(ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any chemical usage, and no known or suspected chemical releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC. has no information or knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include several maps.

(iii) American Pacesetter, Inc. a/k/a "AEI #2" [C0582222] was formed in 1969 as a California domestic stock corporation. This entity occupied the property located at 1600 East Valencia Drive, Fullerton, CA ("Property") from 1970 to 2007 (37 years) as an aerospace manufacturing facility. City of Fullerton, CA Fire Department records reference the extensive use of Tetrachloroethylene (PCE) and Trichloroethene (TCE) during this era. City of Fullerton, CA Fire Department records reference the extensive expansion of operations during this era which included installation of an underground storage tank as well as the storage and usage of large volumes of PCE, TCE and other manufacturing chemicals. This entity discovered and reported releases of the chlorinated solvents: PCE, TCE, 1,1-DCE, 1,1-DCE, 1,2-DCA and Toluene in 1987; and, entered into a \$400,000 Responsible Party settlement with the Orange County Water District for regional water pollution in 2007. Based upon research of publicly available data PBP, INC. is informed and believes Ducommun Inc., acquired American Electronics Inc. of Fullerton, California on or about June 18, 1998. PBP, INC. is informed and believes American Electronics Inc. was thereafter integrated

1 with Ducommun's Jay-El Products subsidiary and relocated to Jay-El Products'  
2 Carson, California facility. PBP, INC. is informed and believes in 1997 American  
3 Electronics Inc. reported 1997 sales of \$7.1 million. At the time American Electronics  
4 Inc. manufactured actuators, stepper motors, fractional horsepower motors and  
5 resolvers for commercial and military space applications. PBP, INC. is informed and  
6 believes at the time William Holland was president of American Electronics Inc. and  
7 thereafter remained with the company. PBP, INC. is informed and believes American  
8 Electronics Inc. was suspended by the California Franchise Tax Board in 2007. The  
9 Lexis Nexis database references American Electronics Inc. sold the Property to Wohl  
10 of Cypress, LLC on November 26, 2003.

11 **REQUEST FOR INFORMATION/PRODUCTION NO. 18:**

12 Indicate on a map of the Facility or in narrative form each location where any of the  
13 following chemicals were used, stored, generated, spilled, or disposed of: PCE, TCE, 1,1-DCE,  
14 1,1,1-TCA, 1,4-dioxane, or perchlorate. Describe any manufacturing or treatment processes in  
15 which any of these chemicals were used.

16 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 18.**

17 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
18 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on  
19 the grounds it calls for attorney-client privileged information, expert witness testimony, and potential  
20 disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad  
21 as it calls for compound responses and/or a compilation.

22 Without waiving these objections, and after conducting a diligent and thorough investigation  
23 of it records, PBP, INC. responds as follows:

- 24 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever  
25 owned the Property or operated the Facility. PNB, INC. has no information or

knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include several maps and narratives about usage of PCE and TCE by "AEI #2" during the period 1970 through 2007 (37 years).

(ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any chemical usage, and no known or suspected chemical releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC. has no information or knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include several maps and narratives about usage of PCE and TCE by "AEI #2" during the period 1970 through 2007.

(iii) American Pacesetter, Inc. a/k/a "AEI #2" [C0582222] was formed in 1969 as a California domestic stock corporation. This entity occupied the property located at 1600 East Valencia Drive, Fullerton, CA ("Property") from 1970 to 2007 (37 years) as an aerospace manufacturing facility. City of Fullerton, CA Fire Department records reference the extensive use of Tetrachloroethylene (PCE) and Trichloroethene (TCE) during this era. City of Fullerton, CA Fire Department records reference the extensive expansion of operations during this era which included installation of an underground storage tank as well as the storage and usage of large volumes of PCE, TCE and other manufacturing chemicals. This entity discovered and reported releases of the chlorinated solvents: PCE, TCE, 1,1-DCE, 1,1-DCE, 1,2-DCA and Toluene in 1987;

1 and, entered into a \$400,000 Responsible Party settlement with the Orange County  
2 Water District for regional water pollution in 2007. Based upon research of publicly  
3 available data PBP, INC. is informed and believes Ducommun Inc., acquired  
4 American Electronics Inc. of Fullerton, California on or about June 18, 1998. PBP,  
5 INC. is informed and believes American Electronics Inc. was thereafter integrated  
6 with Ducommun's Jay-El Products subsidiary and relocated to Jay-El Products'  
7 Carson, California facility. PBP, INC. is informed and believes in 1997 American  
8 Electronics Inc. reported 1997 sales of \$7.1 million. At the time American Electronics  
9 Inc. manufactured actuators, stepper motors, fractional horsepower motors and  
10 resolvers for commercial and military space applications. PBP, INC. is informed and  
11 believes at the time William Holland was president of American Electronics Inc. and  
12 thereafter remained with the company. PBP, INC. is informed and believes American  
13 Electronics Inc. was suspended by the California Franchise Tax Board in 2007.' The  
14 Lexis Nexis database references American Electronics Inc. sold the Property to Wohl  
15 of Cypress, LLC on November 26, 2003.

16 **REQUEST FOR INFORMATION/PRODUCTION NO. 19:**

17 Provide copies, both originals and updates, of hazardous material business plans and  
18 chemical inventory forms submitted to city, county, and/or state agencies for the Facility.

19 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 19.**

20 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
21 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on  
22 the grounds it calls for attorney-client privileged information, expert witness testimony, and potential  
23 disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad  
24 as it calls for compound responses and/or a compilation.

25 Without waiving these objections, and after conducting a diligent and thorough investigation

of it records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility. PNB, INC. has no information or knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include several hazardous material business plans and chemical inventory forms about usage of PCE and TCE by "AEI #2" during the period 1970 through 2007 (37 years).
- (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any chemical usage, and no known or suspected chemical releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC. has no information or knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include several hazardous material business plans and chemical inventory forms about usage of PCE and TCE by "AEI #2" during the period 1970 through 2007.
- (iii) American Pacesetter, Inc. a/k/a "AEI #2" [C0582222] was formed in 1969 as a California domestic stock corporation. This entity occupied the property located at 1600 East Valencia Drive, Fullerton, CA ("Property") from 1970 to 2007 (37 years) as an aerospace manufacturing facility. City of Fullerton, CA Fire Department records reference the extensive use of Tetrachloroethylene (PCE) and Trichloroethene (TCE) during this era. City of Fullerton, CA Fire Department records reference the extensive

1 expansion of operations during this era which included installation of an underground  
2 storage tank as well as the storage and usage of large volumes of PCE, TCE and other  
3 manufacturing chemicals. This entity discovered and reported releases of the  
4 chlorinated solvents: PCE, TCE, 1,1-DCE, 1,1-DCE, 1,2-DCA and Toluene in 1987;  
5 and, entered into a \$400,000 Responsible Party settlement with the Orange County  
6 Water District for regional water pollution in 2007. Based upon research of publicly  
7 available data PBP, INC. is informed and believes Ducommun Inc., acquired  
8 American Electronics Inc. of Fullerton, California on or about June 18, 1998. PBP,  
9 INC. is informed and believes American Electronics Inc. was thereafter integrated  
10 with Ducommun's Jay-El Products subsidiary and relocated to Jay-El Products'  
11 Carson, California facility. PBP, INC. is informed and believes in 1997 American  
12 Electronics Inc. reported 1997 sales of \$7.1 million. At the time American Electronics  
13 Inc. manufactured actuators, stepper motors, fractional horsepower motors and  
14 resolvers for commercial and military space applications. PBP, INC. is informed and  
15 believes at the time William Holland was president of American Electronics Inc. and  
16 thereafter remained with the company. PBP, INC. is informed and believes American  
17 Electronics Inc. was suspended by the California Franchise Tax Board in 2007. The  
18 Lexis Nexis database references American Electronics Inc. sold the Property to Wohl  
19 of Cypress, LLC on November 26, 2003.

20 **REQUEST FOR INFORMATION/PRODUCTION NO. 20:**

21 Provide a list of all chemicals and hazardous substances used at the Facility that contained any of  
22 the following: PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate.

23 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 20.**

24 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
25 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on

1 the grounds it calls for attorney-client privileged information, expert witness testimony, and potential  
2 disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad  
3 as it calls for compound responses and/or a compilation.

4 Without waiving these objections, and after conducting a diligent and thorough investigation  
5 of it records, PBP, INC. responds as follows:

- 6 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever  
7 owned the Property or operated the Facility. PNB, INC. has no information or  
8 knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA.  
9 PNB, INC. has issued a Public Records Request to the City of Fullerton and is  
10 producing a complete copy of all records produced which include several lists of  
11 hazardous substances including PCE and TCE used by "AEI #2" during the period  
12 1970 through 2007 (37 years).
- 13 (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia  
14 Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no  
15 known or suspected records of any chemical usage, and no known or suspected chemical  
16 releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the  
17 period 1964-1970. In 1970 the Property became an asset of American Pacesetter, Inc.  
18 ("AEI #2"). PNB, INC. has no information or knowledge of the operations conducted  
19 at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records  
20 Request to the City of Fullerton and is producing a complete copy of all records  
21 produced which include several lists of hazardous substances including PCE and TCE  
22 used by "AEI #2" during the period 1970 through 2007 (37 years).
- 23 (iii) American Pacesetter, Inc. a/k/a "AEI #2" [C0582222] was formed in 1969 as a  
24 California domestic stock corporation. This entity occupied the property located at  
25 1600 East Valencia Drive, Fullerton, CA ("Property") from 1970 to 2007 (37 years) as

1 an aerospace manufacturing facility. City of Fullerton, CA Fire Department records  
2 reference the extensive use of Tetrachloroethylene (PCE) and Trichloroethene (TCE)  
3 during this era. City of Fullerton, CA Fire Department records reference the extensive  
4 expansion of operations during this era which included installation of an underground  
5 storage tank as well as the storage and usage of large volumes of PCE, TCE and other  
6 manufacturing chemicals. This entity discovered and reported releases of the  
7 chlorinated solvents: PCE, TCE, 1,1-DCE, 1,1-DCE, 1,2-DCA and Toluene in 1987;  
8 and, entered into a \$400,000 Responsible Party settlement with the Orange County  
9 Water District for regional water pollution in 2007. Based upon research of publicly  
10 available data PBP, INC. is informed and believes Ducommun Inc., acquired  
11 American Electronics Inc. of Fullerton, California on or about June 18, 1998. PBP,  
12 INC. is informed and believes American Electronics Inc. was thereafter integrated  
13 with Ducommun's Jay-El Products subsidiary and relocated to Jay-El Products'  
14 Carson, California facility. PBP, INC. is informed and believes in 1997 American  
15 Electronics Inc. reported 1997 sales of \$7.1 million. At the time American Electronics  
16 Inc. manufactured actuators, stepper motors, fractional horsepower motors and  
17 resolvers for commercial and military space applications. PBP, INC. is informed and  
18 believes at the time William Holland was president of American Electronics Inc. and  
19 thereafter remained with the company. PBP, INC. is informed and believes American  
20 Electronics Inc. was suspended by the California Franchise Tax Board in 2007. The  
21 Lexis Nexis database references American Electronics Inc. sold the Property to Wohl  
22 of Cypress, LLC on November 26, 2003.

23 **REQUEST FOR INFORMATION/PRODUCTION NO. 21:**

24 For any PCE, TCE, 1,1-DCE, 1,1,1-TCA, 1,4-dioxane, or perchlorate used at or  
25 transported to or from the Facility, identify and provide the following information:

- a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance;
- b. The locations where each chemical or hazardous substance is or was used, stored, and disposed of;
- c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
- d. The quantity purchased (in gallons) and the time period during which it was used; and
- e. Copies of Material Safety Data Sheets for all hazardous substances used that contain any of these chemicals.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 21.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of its records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility. PNB, INC. has no information or knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include several lists of hazardous substances including PCE and TCE used by "AEI #2" during the period

1970 through 2007, and their brand names, locations and quantities.

(ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any chemical usage, and no known or suspected chemical releases of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC. has no information or knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include several lists of hazardous substances including PCE and TCE used by "AEI #2" during the period 1970 through 2007 (37 years), and their brand names, locations and quantities.

(iii) American Pacesetter, Inc. a/k/a "AEI #2" [C0582222] was formed in 1969 as a California domestic stock corporation. This entity occupied the property located at 1600 East Valencia Drive, Fullerton, CA ("Property") from 1970 to 2007 (37 years) as an aerospace manufacturing facility. City of Fullerton, CA Fire Department records reference the extensive use of Tetrachloroethylene (PCE) and Trichloroethene (TCE) during this era. City of Fullerton, CA Fire Department records reference the extensive expansion of operations during this era which included installation of an underground storage tank as well as the storage and usage of large volumes of PCE, TCE and other manufacturing chemicals. This entity discovered and reported releases of the chlorinated solvents: PCE, TCE, 1,1-DCE, 1,1-DCE, 1,2-DCA and Toluene in 1987; and, entered into a \$400,000 Responsible Party settlement with the Orange County Water District for regional water pollution in 2007. Based upon research of publicly available data PBP, INC. is informed and believes Ducommun Inc., acquired

American Electronics Inc. of Fullerton, California on or about June 18, 1998. PBP, INC. is informed and believes American Electronics Inc. was thereafter integrated with Ducommun's Jay-El Products subsidiary and relocated to Jay-El Products' Carson, California facility. PBP, INC. is informed and believes in 1997 American Electronics Inc. reported 1997 sales of \$7.1 million. At the time American Electronics Inc. manufactured actuators, stepper motors, fractional horsepower motors and resolvers for commercial and military space applications. PBP, INC. is informed and believes at the time William Holland was president of American Electronics Inc. and thereafter remained with the company. PBP, INC. is informed and believes American Electronics Inc. was suspended by the California Franchise Tax Board in 2007. The Lexis Nexis database references American Electronics Inc. sold the Property to Wohl of Cypress, LLC on November 26, 2003.

**REQUEST FOR INFORMATION/PRODUCTION NO. 22:**

Provide copies of all investigation and sampling reports containing environmental data or technical or analytical information regarding soil, water, and air conditions at the Facility, including, but not limited to, data or information related to soil contamination, soil sampling, soil gas sampling, indoor air sampling, geology, groundwater, surface water, and hydrogeology.

- a. State whether the information provided represent a complete list of all soil, soil gas, indoor air, and groundwater sampling conducted at the Facility. If you are aware of any other investigations or sampling reports for which the Company does not have a copy, describe the date and type of sampling conducted, and provide information on where EPA might obtain the report and related documents.
- b. State whether the Company is aware of any planned future soil, soil gas, indoor air, or groundwater sampling at the Facility, and if so, please describe.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 22.**

1 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
2 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on  
3 the grounds it calls for attorney-client privileged information, expert witness testimony, and potential  
4 disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad  
5 as it calls for compound responses and/or a compilation.

6 Without waiving these objections, and after conducting a diligent and thorough investigation  
7 of it records, PBP, INC. responds as follows:

8 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever  
9 owned the Property or operated the Facility. PNB, INC. has no information or  
10 knowledge of the operations conducted at 1600 East Valencia Drive, Fullerton, CA.  
11 PNB, INC. has issued a Public Records Request to the City of Fullerton and is  
12 producing a complete copy of all records produced which include environmental  
13 investigations and sampling reports during the period 1970 to present. PNB, INC. has  
14 issued a Public Records Request to the Regional Water Quality Control Board-Santa  
15 Ana Region and is producing a complete copy of all records produced which are not  
16 publicly available on the GeoTracker Database which include environmental  
17 investigations and sampling reports during the period 1970 to present.

18 (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia  
19 Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no  
20 known or suspected records of any investigation and/or sampling reports of any kind, at  
21 the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970. In  
22 1970 the Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC.  
23 has no information or knowledge of investigations conducted at 1600 East Valencia  
24 Drive, Fullerton, CA after 1970. PNB, INC. has issued a Public Records Request to  
25 the City of Fullerton and is producing a complete copy of all records produced which

1 include environmental investigation and sampling reports during the period 1970 to  
2 present. PNB, INC. has issued a Public Records Request to the Regional Water  
3 Quality Control Board-Santa Ana Region and is producing a complete copy of all  
4 records produced which are not publicly available on the GeoTracker Database which  
5 include environmental investigation and sampling reports during the period 1970 to  
6 present.

7 **REQUEST FOR INFORMATION/PRODUCTION NO. 23:**

8 Identify and provide copies of all agency orders, correspondence, and/or work plans  
9 regarding any soil, soil gas, indoor air, and/or groundwater sampling at the Facility that was  
10 ordered or agreed to be performed, but that was never completed. Explain, to the best of your  
11 ability, why the sampling was not conducted.

12 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 23.**

13 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby  
14 incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on  
15 the grounds it calls for attorney-client privileged information, expert witness testimony, and potential  
16 disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad  
17 as it calls for compound responses and/or a compilation.

18 Without waiving these objections, and after conducting a diligent and thorough investigation  
19 of it records, PBP, INC. responds as follows:

- 20 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever  
21 owned the Property or operated the Facility. PNB, INC. has no information or  
22 knowledge of the operations which were to be conducted at 1600 East Valencia Drive,  
23 Fullerton, CA in compliance with government agency orders and/or directives. PNB,  
24 INC. has issued a Public Records Request to the City of Fullerton and is producing a  
25 complete copy of all records produced which include agency communications about

1 site investigations during the period 1970 to present. PNB, INC. has issued a Public  
2 Records Request to the Regional Water Quality Control Board-Santa Ana Region and  
3 is producing a complete copy of all records produced which are not publicly available  
4 on the GeoTracker Database which include agency communications about site  
5 investigations during the period 1970 to present.

- 6 (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia  
7 Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no  
8 known or suspected records of any investigation and/or sampling communications of any  
9 kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-  
10 1970. In 1970 the Property became an asset of American Pacesetter, Inc. ("AEI #2").  
11 PNB, INC. has no information or knowledge of investigations conducted at 1600  
12 East Valencia Drive, Fullerton, CA after 1970. PNB, INC. has issued a Public  
13 Records Request to the City of Fullerton and is producing a complete copy of all  
14 records produced which include agency communications about site investigations  
15 during the period 1970 to present. PNB, INC. has issued a Public Records Request to  
16 the Regional Water Quality Control Board-Santa Ana Region and is producing a  
17 complete copy of all records produced which are not publicly available on the  
18 GeoTracker Database which include agency communications about site  
19 investigations during the period 1970 to present.

20 **REQUEST FOR INFORMATION/PRODUCTION NO. 24:**

21 Provide copies of any due diligence reports or property transfer assessments related to the  
22 Facility.

23 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 24.**

24 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC.  
25 hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this

1 Request on the grounds it calls for attorney-client privileged information, expert witness testimony,  
2 and potential disclosure of protected attorney work product. The Request is also vague, ambiguous  
3 and overbroad as it calls for compound responses and/or a compilation.

4 Without waiving these objections, and after conducting a diligent and thorough investigation  
5 of it records, PBP, INC. responds as follows:

6 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever  
7 owned the Property or operated the Facility or engaged in any due diligence or property  
8 transfer assessment transactions.

9 (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia  
10 Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no  
11 known or suspected due diligence or property transfer assessment transactions of any  
12 kind, for the 1600 East Valencia Drive, Fullerton, California site from 1964 to 1970.

13 **REQUEST FOR INFORMATION/PRODUCTION NO. 25:**

14 Identify, and provide the following information for, all groundwater wells located at the Facility:

- 15 a. A map with the specific locations of the groundwaterwells;
- 16 b. Dates of well construction;
- 17 c. Depth to groundwater, depth of well, and depth to and of screened intervals;
- 18 d. Uses of each well;
- 19 e. Date each well was abandoned, if applicable;
- 20 f. Date each well was sampled;
- 21 g. All constituents analyzed for during groundwater sampling events; and,
- 22 h. All groundwater sampling results, reports of findings, and analytical data.

23 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 25.**

24 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC.  
25 hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this

1 Request on the grounds it calls for attorney-client privileged information, expert witness testimony,  
2 and potential disclosure of protected attorney work product. The Request is also vague, ambiguous  
3 and overbroad as it calls for compound responses and/or a compilation.

4 Without waiving these objections, and after conducting a diligent and thorough investigation  
5 of it records, PBP, INC. responds as follows:

6 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have  
7 ever owned the Property or operated the Facility. PNB, INC. has no information or  
8 knowledge of any groundwater wells which ever came to be located at 1600 East  
9 Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to  
10 the City of Fullerton and is producing a complete copy of all records produced which  
11 include site investigations during the period 1970 to present. PNB, INC. has issued a  
12 Public Records Request to the Regional Water Quality Control Board-Santa Ana  
13 Region and is producing a complete copy of all records produced which are not  
14 publicly available on the GeoTracker Database which include agency  
15 communications about groundwater well investigations during the period 1970 to  
16 present.

17 (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia  
18 Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no  
19 known or suspected records of any investigation and/or sampling communications of any  
20 kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-  
21 1970. In 1970 the Property became an asset of American Pacesetter, Inc. ("AEI #2").  
22 PNB, INC. has no information or knowledge of any groundwater wells which came  
23 to be located at 1600 East Valencia Drive, Fullerton, CA after 1970. PNB, INC. has  
24 issued a Public Records Request to the City of Fullerton and is producing a complete  
25 copy of all records produced which include site investigations during the period 1970

1 to present. PNB, INC. has issued a Public Records Request to the Regional Water  
2 Quality Control Board-Santa Ana Region and is producing a complete copy of all  
3 records produced which are not publicly available on the GeoTracker Database which  
4 include agency communications about groundwater well investigations during the  
5 period 1970 to present.

6 **REQUEST FOR INFORMATION/PRODUCTION NO. 26:**

7 Provide copies of any applications for permits or permits received for the Facility under any local,  
8 state, or federal environmental laws and regulations, including any waste discharge permits (e.g.,  
9 national pollutant discharge elimination system [NPDES] permits).

10 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 26.**

11 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC.  
12 hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this  
13 Request on the grounds it calls for attorney-client privileged information, expert witness testimony,  
14 and potential disclosure of protected attorney work product. The Request is also vague, ambiguous  
15 and overbroad as it calls for compound responses and/or a compilation.

16 Without waiving these objections, and after conducting a diligent and thorough investigation  
17 of it records, PBP, INC. responds as follows:

- 18 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have  
19 ever owned the Property or operated the Facility. PNB, INC. has no information or  
20 knowledge of any environmental permit applications or permits pertaining to 1600  
21 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request  
22 to the City of Fullerton and is producing a complete copy of all records produced  
23 which include environmental permit applications or permits pertaining to the period  
24 1970 to present. PNB, INC. has issued a Public Records Request to the Regional  
25 Water Quality Control Board-Santa Ana Region and is producing a complete copy of

all records produced which are not publicly available on the GeoTracker Database which include environmental permit applications and permits pertaining to the period 1970 to present.

(ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no known or suspected records of any environmental permit applications or permit communications of any kind, at the 1600 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC. has no information or knowledge of any environmental permit applications or permits pertaining to 1600 East Valencia Drive, Fullerton, CA after 1970. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include environmental permit applications or permits pertaining to the period 1970 to present. PNB, INC. has issued a Public Records Request to the Regional Water Quality Control Board-Santa Ana Region and is producing a complete copy of all records produced which are not publicly available on the GeoTracker Database which include agency communications about environmental permit applications and permits pertaining to the period 1970 to present.

**REQUEST FOR INFORMATION/PRODUCTION NO. 27:**

For each waste stream generated at the Facility, identify the waste and describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 27.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony,

1 and potential disclosure of protected attorney work product. The Request is also vague, ambiguous  
2 and overbroad as it calls for compound responses and/or a compilation.

3 Without waiving these objections, and after conducting a diligent and thorough investigation  
4 of it records, PBP, INC. responds as follows:

5 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have  
6 ever owned the Property or operated the Facility. PNB, INC. has no information or  
7 knowledge of any waste streams pertaining to 1600 East Valencia Drive, Fullerton,  
8 CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is  
9 producing a complete copy of all records produced which include waste stream  
10 communications pertaining to the period 1970 to present. PNB, INC. has issued a  
11 Public Records Request to the Regional Water Quality Control Board-Santa Ana  
12 Region and is producing a complete copy of all records produced which are not  
13 publicly available on the GeoTracker Database which include waste stream  
14 communications pertaining to the period 1970 to present.

15 (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia  
16 Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no  
17 known or suspected waste stream communications of any kind, pertaining to the 1600  
18 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the  
19 Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC. has no  
20 information or knowledge of any waste stream communications pertaining to 1600  
21 East Valencia Drive, Fullerton, CA after 1970. PNB, INC. has issued a Public  
22 Records Request to the City of Fullerton and is producing a complete copy of all  
23 records produced which include waste stream communications pertaining to the  
24 period 1970 to present. PNB, INC. has issued a Public Records Request to the  
25 Regional Water Quality Control Board-Santa Ana Region and is producing a

complete copy of all records produced which are not publicly available on the GeoTracker Database which include waste stream communications pertaining to the period 1970 to present.

**REQUEST FOR INFORMATION/PRODUCTION NO. 28:**

If the Company discharged any of its waste stream at the Facility to the sewer, identify all locations where waste streams were discharged and provide copies of all permits and all analyses performed on discharged water.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 28.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of its records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility. PNB, INC. has no information or knowledge of any waste streams pertaining to 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include waste stream communications pertaining to the period 1970 to present. PNB, INC. has issued a Public Records Request to the Regional Water Quality Control Board-Santa Ana Region and is producing a complete copy of all records produced which are not publicly available on the GeoTracker Database which include waste stream communications pertaining to the period 1970 to present.

1 (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia  
2 Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no  
3 known or suspected waste stream communications of any kind, pertaining to the 1600  
4 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the  
5 Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC. has no  
6 information or knowledge of any waste stream communications pertaining to 1600  
7 East Valencia Drive, Fullerton, CA after 1970. PNB, INC. has issued a Public  
8 Records Request to the City of Fullerton and is producing a complete copy of all  
9 records produced which include waste stream communications pertaining to the  
10 period 1970 to present. PNB, INC. has issued a Public Records Request to the  
11 Regional Water Quality Control Board-Santa Ana Region and is producing a  
12 complete copy of all records produced which are not publicly available on the  
13 GeoTracker Database which include waste stream communications pertaining to the  
14 period 1970 to present.

15 **REQUEST FOR INFORMATION/PRODUCTION NO. 29:**

16 Describe the method(s) used by the Company to remove waste streams from sumps at the  
17 Facility.

18 **RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 29.**

19 PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC.  
20 hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this  
21 Request on the grounds it calls for attorney-client privileged information, expert witness testimony,  
22 and potential disclosure of protected attorney work product. The Request is also vague, ambiguous  
23 and overbroad as it calls for compound responses and/or a compilation.

24 Without waiving these objections, and after conducting a diligent and thorough investigation  
25 of it records, PBP, INC. responds as follows:

1 (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have  
2 ever owned the Property or operated the Facility. PNB, INC. has no information or  
3 knowledge of any waste streams pertaining to 1600 East Valencia Drive, Fullerton,  
4 CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is  
5 producing a complete copy of all records produced which include waste stream  
6 communications pertaining to the period 1970 to present. PNB, INC. has issued a  
7 Public Records Request to the Regional Water Quality Control Board-Santa Ana  
8 Region and is producing a complete copy of all records produced which are not  
9 publicly available on the GeoTracker Database which include waste stream  
10 communications pertaining to the period 1970 to present.

11 (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia  
12 Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There are no  
13 known or suspected waste stream communications of any kind, pertaining to the 1600  
14 East Valencia Drive, Fullerton, California site during the period 1964-1970. In 1970 the  
15 Property became an asset of American Pacesetter, Inc. ("AEI #2"). PNB, INC. has no  
16 information or knowledge of any waste stream communications pertaining to 1600  
17 East Valencia Drive, Fullerton, CA after 1970. PNB, INC. has issued a Public  
18 Records Request to the City of Fullerton and is producing a complete copy of all  
19 records produced which include waste stream communications pertaining to the  
20 period 1970 to present. PNB, INC. has issued a Public Records Request to the  
21 Regional Water Quality Control Board-Santa Ana Region and is producing a  
22 complete copy of all records produced which are not publicly available on the  
23 GeoTracker Database which include waste stream communications pertaining to the  
24 period 1970 to present.

**REQUEST FOR INFORMATION/PRODUCTION NO. 30:**

Identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. Identify and provide supporting documentation of:

- a. The date each release occurred;
- b. The cause of each release;
- c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
- d. Where each release occurred and what areas were impacted by the release; and
- e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 30.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation.

Without waiving these objections, and after conducting a diligent and thorough investigation of its records, PBP, INC. responds as follows:

- (i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility. PNB, INC. has no information or knowledge of any leaks, spills or other releases pertaining to 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include

1 communications about leaks, spills and other releases pertaining to the period 1970 to  
2 present. PNB, INC. has issued a Public Records Request to the Regional Water  
3 Quality Control Board-Santa Ana Region and is producing a complete copy of all  
4 records produced which are not publicly available on the GeoTracker Database which  
5 include communications pertaining to leaks, spills and other releases the period 1970  
6 to present.

- 7 (ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia  
8 Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There was no  
9 known or suspected use of hazardous substances or production of hazardous wastes  
10 pertaining to the 1600 East Valencia Drive, Fullerton, California site during the period  
11 1964-1970. In 1970 the Property became an asset of American Pacesetter, Inc. ("AEI  
12 #2"). PNB, INC. has no information or knowledge of any leak, spill or other type of  
13 release communications pertaining to 1600 East Valencia Drive, Fullerton, CA after  
14 1970. PNB, INC. has issued a Public Records Request to the City of Fullerton and is  
15 producing a complete copy of all records produced which include communications  
16 about leaks, spills or other releases pertaining to the period 1970 to present. PNB,  
17 INC. has issued a Public Records Request to the Regional Water Quality Control  
18 Board-Santa Ana Region and is producing a complete copy of all records produced  
19 which are not publicly available on the GeoTracker Database which include  
20 communications pertaining to leaks, spills and other releases the period 1970 to  
21 present.

22 **REQUEST FOR INFORMATION/PRODUCTION NO. 31:**

23 Provide copies of any correspondence between the Company and local, state, or federal  
24 authorities concerning the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-  
25 dioxane, or perchlorate at the Facility, including but not limited to any correspondence concerning

any of the releases identified in response to the previous question.

**RESPONSE TO REQUEST FOR INFORMATION/PRODUCTION NO. 31.**

PBP, INC. hereby incorporates GENERAL OBJECTIONS 1-5 by reference. PBP, INC. hereby incorporates its PREAMBLE and Exhibit 1 by reference. PBP, INC. hereby objects to this Request on the grounds it calls for attorney-client privileged information, expert witness testimony, and potential disclosure of protected attorney work product. The Request is also vague, ambiguous and overbroad as it calls for compound responses and/or a compilation. Without waiving these objections, and after conducting a diligent and thorough investigation of its records, PBP, INC. responds as follows:

(i) Pacesetter Business Properties, Inc. [C0593067] is not known or believed to have ever owned the Property or operated the Facility. PNB, INC. has no information or knowledge of the use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate pertaining to 1600 East Valencia Drive, Fullerton, CA. PNB, INC. has issued a Public Records Request to the City of Fullerton and is producing a complete copy of all records produced which include communications about the use, handling, or disposal of PCE and TCE pertaining to the period 1970 to present. PNB, INC. has issued a Public Records Request to the Regional Water Quality Control Board-Santa Ana Region and is producing a complete copy of all records produced which are not publicly available on the GeoTracker Database which include communications about the use, handling, or disposal of PCE and TCE pertaining to the period 1970 to present.

(ii) American Electric Motors, Inc. [C0199389] briefly owned and listed 1600 East Valencia Drive, Fullerton, CA as its principal place of business from 1964 to 1970. There was no known or suspected use, handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate pertaining to the 1600 East Valencia Drive, Fullerton, California

1 site during the period 1964-1970. In 1970 the Property became an asset of American  
2 Pacesetter, Inc. ("AEI #2"). PNB, INC. has no information or knowledge of any use,  
3 handling, or disposal of PCE, TCE, 1,1,1-TCA, 1,1-DCE, 1,4-dioxane, or perchlorate  
4 pertaining to 1600 East Valencia Drive, Fullerton, CA after 1970. PNB, INC. has  
5 issued a Public Records Request to the City of Fullerton and is producing a complete  
6 copy of all records produced which include communications about the use, handling,  
7 or disposal of PCE and TCE pertaining to the period 1970 to present. PNB, INC. has  
8 issued a Public Records Request to the Regional Water Quality Control Board-Santa  
9 Ana Region and is producing a complete copy of all records produced which are not  
10 publicly available on the GeoTracker Database which include communications about  
11 the use, handling, or disposal of PCE and TCE pertaining to the period 1970 to present.

12 Dated: April 18, 2019

BOIS & MACDONALD

13  
14 By: 

Thomas J. Bois, II  
James C. Macdonald  
Attorneys for PACESETTER BUSINESS  
PROPERTIES, INC.

# **Exhibit 1**

**EXHIBIT 1 -- TO PACESETTER BUSINESS PROPERTIES, INC.'S RESPONSE TO USEPA'S RFI/RFD  
CALIFORNIA SECRETARY OF STATE CORPORATE CHRONOLOGY**

DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
1945			
09/06/1945	API Incorporates as "AMERICAN ELECTRIC MOTORS, INC." [C0199389] to manufacture electrical equipment [Arthur Lamel, Ray Cripps, Stanley Swiatek].	*****	*****
1954			
07/07/1954	Amendment changing name from "AMERICAN ELECTRIC MOTORS, INC." to "AMERICAN ELECTRONICS, INC." to manufacture electrical equipment. Capital stock changed from 100 NPV to \$850,000.00. [Arthur Lamel]	*****	*****
1957			
02/13/1957	Amendment changing capital stock from \$850,000 to \$2.85MM [Arthur Lamel]	*****	*****
12/31/1957	Merger of Cal-Air Engineering into American Electronics, Inc. [G.E. Ronk V.P.]	*****	*****
1959			
12/31/1959	Amendment – Certificate of Ownership re Merger [Phillip W. Zonne, President]	*****	*****

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DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
1962			
05/23/1962	Amendment – moving principal place of business to Orange County, CA [R.C. Loomis, President]	*****	*****
1963			
06/07/1963	Amendment changing capital structure from \$2.85MM to \$7.85MM [Robert C. Loomis]  Principal place of business: 1594 East Ross Avenue, Fullerton, CA.	*****	*****
1964			
06/09/1964	Amendment changing capital structure from \$7.85MM to \$11MM [Robert C. Loomis]  Principal place of business: 1600 East Valencia Drive, Fullerton, CA.	*****	*****
06/10/1964	Amendment creating "Preferred Stock" (Series A) [500,000 x \$10 each] = \$5MM [Robert C. Loomis]	*****	*****
1966			
04/13/1966	Amendment decreasing number of Series A	*****	*****

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DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
	Preferred Shares to 240,000 from 500,000; 40,000 shares issued. [Robert C. Loomis]		
05/6/1966	Amendment creating Series B Preferred Shares totaling 460,000 shares. [Robert C. Loomis]	*****	*****
06/03/1966	Amendment designating total authorized shares of 10MM; 500k of 10MM to be Preferred Stock. [Robert C. Loomis]	*****	*****
1967			
05/24/1967	Amendment changing capital structure from \$10.5MM to \$15MM [Robert B. Phinizy]	*****	*****
1968			
01/05/1968	Amendment decreasing Preferred Shares, Series A from 40,000 to 20,000; and limiting Series B to total 110,000; and creating new class of Convertible Preference Stock to total 370,000 shares: 500,000 total. Setting Common Stock dividend structure. [Robert B. Phinizy]	*****	*****
01/05/1968	Amendment increasing total outstanding shares to 11MM [Robert B. Phinizy]	*****	*****

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DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
01/05/1968	Amendment to Par Value from \$15MM to \$20MM [Robert B. Phinizy]	*****	*****
06/19/1968	Amendment changing Par Value from \$15MM to \$20MM	*****	*****
1969			
10/07/1969			Articles of Incorporation of <b>AMERICAN PACESETTER, INC. [C0582222]</b> [Directors: David H. Vena; Bruce H. Lederman; and, Thomas W. Dobson]
1970			
03/02/1970		Articles of Incorporation of <b>AEI DEVELOPMENT, INC.</b> [C0593067] ( <b>Note:</b> name similarity to American Electronics, Inc. "AEI") established for the purpose of purchasing, improving, developing raw land into homes. One (1) class of stock, 1,000 shares @ \$25.00 each. [Directors: David H. Vena; Bruce H. Lederman; Thomas G. Bost; and, William H. Lewis]	
03/16/1970		<b>MERGER of PACESETTER HOMES, INC. into AEI DEVELOPMENT, INC.</b> Method of Merger: Conversion of shares of Pacesetter Homes, Inc.	

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DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
		through an exchange for shares of AMERICAN ELECTRONICS, INC. [i.e. AEI Development owned American Electronics stock and transferred that stock [1,534,680 shares] to American Pacesetter's shareholders in exchange for all of American Pacesetter's shares [40 shares outstanding] and assets (\$\$ value unknown but probably \$15.34MM). [Roy F. Cook, VP AEI Development Inc.]	
03/16/1970		<p>Merger Agreement of PACESETTER HOMES, INC. ("Merged Corporation") into AEI DEVELOPMENT, INC. ("Surviving Corporation") AEI Development, Inc. takes on the name of PACESETTER HOMES, INC.</p> <p>Conversion ratio: 3069.36 shares of AEI common stock for one (1) share of Pacesetter common stock [3,069.36 x 40 = 122,774.40 shares][John W. Klug signs for Pacesetter Homes, Inc.; Roy F. Cook signs for AEI Development, Inc.]</p>	
06/11/1970	<p>Amendment of name from AMERICAN ELECTRONICS, INC. to AMERICAN PACESETTER</p> <p>Par Value changed from \$20MM to \$11MM [Roy F. Cook, VP]</p>	<p>??? -----&gt;</p> <p>&lt;----- ???</p>	<p>Amendment of name from AMERICAN PACESETTER, INC. to AMERICAN ELECTRONICS, INC.</p> <p>[Thomas W. Dobson, Incorporator; Bruce R. Lederman, Incorporator]</p>
1972			

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DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESSS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
12/29/1972		Agreement of Merger of J.W. Klug Development Co., Inc. into PACESETTER HOMES, INC.	
1980			
08/21/1980	Amendment limiting classes of stock to Preferred Stock (1Mm shares) and Common Stock (10MM shares). [John W. Klug , President and John R. Polen, Secretary]		
08/22/1980	Amendment setting reverse split of Common Shares 200 shares to 1 share. [John W. Klug , President and John R. Polen, Secretary]		
1984			
12/21/1984			MERGER of Micro-Check, Inc. into AMERICAN ELECTRONICS, INC.  AEI, INC. owns all outstanding shares of Micro-Check, Inc. and merges Micro-Check, Inc. into AMERICAN ELECTRONICS, INC.
1988			
06/17/1988		Amendment changing name from PACESETTER HOMES, INC. to PACESETTER	

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DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
		<b>BUSINESS PROPERTIES.</b> Authorizing issuance of 10MM common shares and 1MM preferred shares. [John Klug, Chairman]	
06/29/1988	Amendment establishing AMERICAN PACESETTER as owner of Woodleaf Mortgage, Co. by merger. [John W. Klug , President and John R. Polen, Secretary]		
08/18/1988	Amendment establishing decrease in number of Preferred Shares to 0. [John W. Klug , President and Donald W. Killian, Asst. Secretary]		
	<b>Restated Articles of Incorporation of American Pacesetter, Inc. renaming company to AMERICAN PACESETTER.</b> [John W. Klug , President and Donald W. Killian, Asst. Secretary]		
09/13/1988	Certificate of Amendment of Articles of Incorporation of American Pacesetter, eliminating personal liability for directors and indemnifying agents. [John W. Klug , President and John R. Polen, Secretary]		
1989			

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DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESSS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
06/26/1989	Certificate of Amendment of Articles of Incorporation of American Pacesetter providing indemnification for agents and limiting shares to: 1,531,101. [John W. Klug , President and L. Robina Husting, Secretary]		
06/28/1989		Amendment of Pacesetter Business Properties providing indemnification for agents and limiting shares to: 1,542,355 [Steven R. Strauss, President]	
1996			
01/19/1996		Certificate of Restatement and Amendment of Articles re compliance with Bankruptcy Court Reorganization Order dated December 18, 1995, Case No. SA 93-12500 JR USBC-CDC. [John W. Klug , President and Steven R. Strauss, Secretary]	
01/24/1996	Certificate of Restatement of Articles of Incorporation of American Pacesetter re compliance with Bankruptcy Court Reorganization Order dated December 18, 1995, Case No. SA 93-12500 JR USBC-CDC. [John W. Klug , President and Steven R. Strauss, Secretary]		

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CALIFORNIA SECRETARY OF STATE CORPORATE CHRONOLOGY**

DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
06/21/1996			Amendment authorizing only one class of stock with 500,000 shares at \$10.00 par value. [Richard F. Holland, President and Jean M. Rhodes, Secretary]
07/02/1996			MERGER of AEI HOLDING CO., INC. (Merged Corporation) into its subsidiary AMERICAN ELECTRONICS, INC. (Surviving Corporation) with 1:1 stock conversion. [Richard F. Holland, President and Jean M. Rhodes, Secretary]
1998			
04/09/1998		MERGER of PACESETTER BUSINESS PROPERTIES and PACMERB, Inc. PACMERB, Inc. owns all outstanding shares of PACESETTER BUSINESS PROPERTIES, INC. is subsidiary. PACMERB, Inc. is merging into PACESETTER BUSINESS PROPERTIES, INC. [John W. Klug , President and Steven R. Strauss, Secretary]	
1999			
11/12/1999	Statement by Domestic Stock Corporation, 1300 N. Bristol Street, Newport Beach, CA. [John W. Klug , President and Steven R. Strauss, Secretary]		
2001			

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CALIFORNIA SECRETARY OF STATE CORPORATE CHRONOLOGY**

DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
08/20/2001	Statement by Domestic Stock Corporation – No Change, 1300 N. Bristol Street, Newport Beach, CA. [John W. Klug , President and Steven R. Strauss, Secretary]		
2002			
12/20/2002	Certificate of Amendment of Articles of Incorporation of American Pacesetter deleting Article III. [John W. Klug , President and Steven R. Strauss, Secretary]		
12/23/2002		Certificate of Amendment of Articles of Incorporation of Pacesetter Business Properties deleting Article V. [John W. Klug , President and Steven R. Strauss, Secretary]	
12/26/2002	Agreement of Merger of AMERICAN PACESETTER, INC. (Merged Corporation) and PACESETTER HOMES, INC. (Merged Corporation) into PACESETTER BUSINESS PROPERTIES, INC. (Survivor) [John W. Klug , President and Steven R. Strauss, Secretary]	Agreement of Merger of AMERICAN PACESETTER, INC. (Merged Corporation) and PACESETTER HOMES, INC. (Merged Corporation) into PACESETTER BUSINESS PROPERTIES, INC. (Survivor) [John W. Klug , President and Steven R. Strauss, Secretary]  <ul style="list-style-type: none"> <li>• Effective: 12/18/2002</li> <li>• API and PHI ceased to exist</li> <li>• PACESETTER BUSINESS PROPERTIES, INC. assumes "all debts, liabilities and duties</li> </ul>	

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DATE	AMERICAN PACESETTER, INC. EVENT	PACESETTER BUSINESS PROPERTIES, INC EVENT	AMERICAN ELECTRONICS, INC. EVENT
		of API and PHI" [PBP: John W. Klug, Pres., Steven Strauss, Sec.; API: John W. Klug, Pres., Steven Strauss, Sec.; PHI: John W. Klug, Pres., Steven Strauss, Sec.]	
2004			
09/02/2004			Statement of Information of AMERICAN ELECTRONICS, INC., 111 W. Ocean Blvd. Ste. 900, Long Beach, CA [Officers: Joseph C. Berenato, CEO; Samuel D. Williams, CFO; Directors: Joseph C. Berenato, James S. Heiser, Michael W. Williams all at 23301 Wilmington Ave, Carson, CA - - Aerospace Manufacturing]
2006			
11/02/2006			Statement of Information- No Change of AMERICAN ELECTRONICS, INC., 23301 Wilmington Ave., Carson, CA signed by Samuel D. Williams
			SINCE SUSPENDED BY CALIFORNIA FRANCHISE TAX BOARD
2014			
02/11/2014	*****	Statement of Information: of PACESETTER BUSINESS PROPERTIES, INC. [Eric	*****

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CALIFORNIA SECRETARY OF STATE CORPORATE CHRONOLOGY

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**PROOF OF SERVICE**

**In the Matter of: Orange County North Basin Study Area; 1600 East Valencia Drive, 501 S. Acacia Avenue, Fullerton, California**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Bois & Macdonald, 2030 Main Street, Suite 660, Irvine, California 92614. On April 18, 2019, I served the within document:

**PACESETTER BUSINESS PROPERTIES, INC'S RESPONSE TO USEPA'S REQUEST FOR INFORMATION AND PRODUCTION OF DOCUMENTS (Set 1)**

**By Mail**            by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.  
**X**

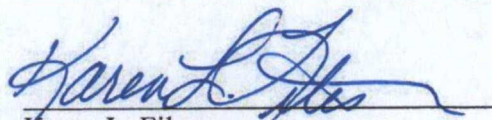
**By E-Mail**            by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below:  
**X**

Kim Muratore  
Case Developer  
USEPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
Email: [muratore.kim@epa.gov](mailto:muratore.kim@epa.gov)

Bethany A. Dreyfus, Esq.  
Assistant Regional Counsel  
USEPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
Email: [dreyfus.bethany@epa.gov](mailto:dreyfus.bethany@epa.gov)

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed April 18, 2019 at Irvine, California.

  
Karen L. Files